



February 21, 2005

Mr. Deepak Joshi
National Transportation Safety Board
490 L'Enfant Plaza, SW,
Room 5235
Washington, DC 20594

Dear Mr. Joshi

I am writing to express my opinion to the proposed rule change to Title 59, part 830 of the Code of Federal Regulations. The Change I am addressing is the one that calls for Rotor blade Strikes to be ruled substantial damage and required to be reported as an ACCIDENT under part 830.5.

I am vehemently opposed to such a change, as rotor blade strikes in many cases are not any different than wing tip, or propeller strikes in an airplane. There have been occasions where we have had a blade strike in the morning, and been flying the very same aircraft in the afternoon. How could you call this substantial damage when the aircraft is flying again in six hours? Rotor blades are easily damaged. Also rotor blades are time life items, to be replaced on a schedule. What if a set of blades have two tenths of an hour remaining until retirement, and are damaged then? If cost is to be used as a determining factor, most operators do not even turn in blade strikes to the insurance companies because a set of blades more often than not cost less than the deductible on the policy. If claimed on the insurance policy, or reported as an ACCIDENT to the NTSB, the insurance companies will only raise the rates on the operator. If blades are struck hard enough to do substantial damage to the airframe or other rotating components then it should be called an accident. The rule as it is written now, is as it should be, there is no reason to change this sound policy.

Sincerely

A handwritten signature in black ink, appearing to read "Joe Sheeran", is written over a horizontal line.

Joe Sheeran
President, Vortex Helicopters Inc.